

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

SHELLY L. MILTON,

Plaintiff,

Case No. 16-cv-14033

vs.

Hon. Paul D. Borman

WAYNE COUNTY and ROBERT
DUNLAP,

Defendants.

BOYLAN LAW, P.C.
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DEFENDANTS' WITNESS LIST

Defendants Wayne County and Robert Dunlap, by their attorneys, Allen Brothers, Attorneys & Counselors, PLLC, submit the following list of witnesses that may be called at trial:

1. Plaintiff and Wayne County Sheriff's Office Corporal **Shelly L. Milton**, c/o counsel – 410 W. University Dr., Suite 201, Rochester, MI;
2. Defendant and Wayne County Sheriff's Office Chief **Robert Dunlap**, c/o Defense Counsel, 400 Monroe St., Suite 600, Detroit, MI;
3. Wayne County Sheriff's Office Deputy Chief **Raphael Washington**, c/o Defense Counsel, 400 Monroe St., Suite 600, Detroit, MI;
4. Wayne County Sheriff's Officer Chief of Staff **Michael Turner**, c/o Defense Counsel, 400 Monroe St., Suite 600, Detroit, MI;
5. **Avery Williams**, 535 Griswold Street, Suite 1000, Detroit, Michigan;
6. Wayne County Sheriff's Office Commander **David Praedel**, 1231 St. Antoine St., Detroit, MI 48226;
7. Wayne County Sheriff's Office Deputy and Wayne County Deputy Sheriff Association Vice President **Jeremy Cady**, 27056 Joy Road, Redford, MI 48239;
8. Wayne County Sheriff's Office Deputy and Wayne County Deputy Sheriff Association President **Brian Earl**, 1231 St. Antoine St., Detroit, MI 48226;
9. Wayne County Sheriff's Office Captain **Reid Chakrabarty**, 1231 St. Antoine St., Detroit, MI 48226;
10. Wayne County Sheriff's Office Corporal **Eric Catner**, 1231 St. Antoine St., Detroit, MI 48226;
11. Wayne County Sheriff's Office Corporal **Leonard Skalba**, 1231 St. Antoine St., Detroit, MI 48226;

12. Wayne County Sheriff's Office Corporal **Angela Reed**, 1231 St. Antoine St., Detroit, MI 48226;
13. Wayne County Sheriff's Office Corporal **Carlos Banks**, 1231 St. Antoine St., Detroit, MI 48226;
14. Wayne County Sheriff's Office Corporal **Charles Smith**, 1231 St. Antoine St., Detroit, MI 48226;
15. Wayne County Sheriff's Office Corporal **Corey Grant**, 1231 St. Antoine St., Detroit, MI 48226;
16. Wayne County Sheriff's Office Deputy **Lacey L. Polderdyke**, 1231 St. Antoine St., Detroit, MI 48226;
17. Wayne County Sheriff's Office Deputy Chief **Scott Gatti**, 1231 St. Antoine St., Detroit, MI 48226;
18. Wayne County Sheriff's Office Deputy Chief **Michael Jaafer**, 1231 St. Antoine St., Detroit, MI 48226;
19. Wayne County Sheriff's Office Deputy and Union Steward **John Fuller**, 1231 St. Antoine St., Detroit, MI 48226;
20. Wayne County Sheriff's Office Senior Personnel Officer **Evelia Saucedo**, 1231 St. Antoine St., Detroit, MI 48226;
21. Wayne County Sheriff's Office Under Sheriff **Daniel Pfannes**, 1231 St. Antoine St., Detroit, MI 48226;
22. Wayne County Sheriff **Benny N. Napoleon**, 1231 St. Antoine St., Detroit, MI 48226;
23. Wayne County Sheriff's Office Senior Personnel Officer **John Asquini**, 1231 St. Antoine St., Detroit, MI 48226;
24. Wayne County Sheriff's Office Sergeant **Lee Smith**, 1231 St. Antoine St., Detroit, MI 48226;

25. All of Plaintiff's treating health care providers;
26. All lay and expert witnesses endorsed by Plaintiff in her Rule 26(a) Initial Disclosures and all subsequent Lay and Expert Witness Lists;
27. All lay persons and experts necessary as rebuttal witnesses;
28. Any and all witnesses disclosed during the discovery process, including but not limited to, witnesses disclosed via written discovery and/or at the time of trial.

Reservation of Right

Defendants reserve their right to amend their witness list upon completion of discovery and in accordance with the Court's Scheduling Order.

ALLEN BROTHERS,
Attorneys & Counselors, PLLC

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Dated: May 18, 2018

CERTIFICATE OF SERVICE

I hereby certify that, on May 18, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing and copy of the foregoing paper upon attorney of record.

Karie H. Boylan - karie@boylanlaw.net

/s/Tara Kendrick

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